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January 16, 2020

Via ECF and USPS First Class Mail

Hon. Deborah A. Batts
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, N.Y. 10007-1312

**Re: USA v. Jonathan Richardson
Docket No. 18 cr. 00657(DAB)**

Dear Judge Batts:

Please be reminded that I am the attorney of record for Jonathan Richardson, the defendant in connection with the above-referenced matter. I write to request a final extension of the two additional weeks for the defendant's sentencing submission for the reason set forth below.

Pursuant to the Court's Order entered on December 11, 2019, the defendant's written sentencing submission is currently due by January 30, 2020, the Government's response is due by February 13, 2020 and the sentencing date was adjourned *sine die*.

The defense received a copy of the draft of the mitigation report (report) for submission to the Court on December 19, 2019, shortly before the holiday season. However, the defense is still awaiting the final report, with attachments, for submission from our mitigation specialist and I anticipate receiving same by the end of next week. I am informed that the final submission of the report is in the process of being completed.

Upon receipt of the completed report, the undersigned will meet with Mr. Richardson, who is confined at MDC pending sentencing, to review the report and, thereafter, to review our proposed sentencing submission.

Given the unanticipated and unavoidable delays in the finalization of the report, the undersigned writes to request that the Court grant the extension of two weeks, or fourteen (14) days requested herein from the current submission date, and a corresponding extension of time for the Government's response.

I have discussed the instant request with AUSA Andrew Chan and he does not oppose my instant request.

Ultimately, I request an extension of the date for the defendant's written sentencing submission to February 14, 2020, an extension of the date for the Government's response to February 28, 2020 and that sentencing be adjourned *sine die*. GRANTED
/s/DAB
1/17/2020

Thank you for your consideration.

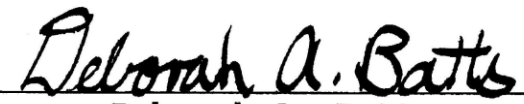
Respectfully Submitted,


David M. Colgan, Esq.

cc: **Via ECF and email Andrew.Chan@usdoj.gov**

Andrew Chan, Esq.
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrews Plaza
New York, N.Y. 10007

SO ORDERED


Deborah A. Batts
United States District Judge

January 17, 2020